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February 24, 2012

VIA ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Comments for Auction 901, AU Docket No. 12-25

Dear Ms. Dortch:

The Commonwealth Office of Broadband Outreach and Development (OBOD) submits the following comments on behalf of the Commonwealth of Kentucky to Auction 901 for AU Docket No. 12-25:

Use of Road Miles Covered:

OBOD respectfully requests that the Commission consider population served – and not exclusively road miles covered - as a basis for awards in the upcoming 901 Auction. The mountainous terrain (*or topography*) of the Commonwealth creates formidable barriers to broadband coverage. The impact is evidenced in the Commission's Attachment A to this proceeding, showing that the Commonwealth has far greater population in uncovered potentially eligible census blocks than any other state in the nation except West Virginia, a neighboring state which shares a border, a similar topography, similar challenges to broadband coverage, and nearly the same unserved population numbers in the Commission's defined potentially eligible census blocks.

The Commonwealth urgently needs to extend the benefits of broadband to its citizens in hard-to-reach, costly-to-serve and rural areas. To do so, the Commonwealth needs providers to expand the reach of broadband service to the nearly one quarter of a million Commonwealth citizens who live in the unserved census blocks. The Commission's upcoming 901 Auction is one of the most promising opportunities OBOD has seen to encourage wireless broadband coverage in unserved areas of the Commonwealth.

Although the Commonwealth has the greatest population residing in census blocks not served by broadband, the Commonwealth does not span a large geography relative to

the rest of the nation, or even relative to other states. OBOD is concerned that if "road miles covered" is the basis for awards, then Commonwealth citizens who live in small geographies of uncovered areas, or in geographies where road miles are not maximized, may miss out on this key opportunity to get access to wireless broadband for the first time.

OBOD requests that the Commission consider other factors, such as maximum population in uncovered census blocks, to be an auction award consideration. Such an approach would provide a better opportunity to extend the reach and benefits of broadband to significantly more citizens who still do not have access to this essential communications vehicle.

Broadband coverage is a top priority for the OBOD. The first priority in the Commonwealth must be to reach the citizens, and OBOD respectfully requests that the Commission consider the alternative approach for an award in the Commonwealth based on population served, rather than road miles covered, in the upcoming 901 Auction.

Use of American Roamer Data:

OBOD has been developing and refining maps of broadband coverage in the Commonwealth since 2010. Attached is a map that shows differences in the Commission's map based on American Roamer Data, and the Commonwealth's map based on its SBI aggregated data collection. Because of these significant differences, OBOD requests that the Commission consider using other data sources, either instead of or in conjunction with the American Roamer Data to determine areas eligible for Phase I Mobility Fund support. Further, OBOD will have an updated map by the first of April 2012, and requests an opportunity to compare its updated map with the proposed American Roamer Data map to identify discrepancies and determine potential alternative approaches.

OBOD therefore supports the Motions for Extension of Time filed by the Rural Telecommunications Group ("RTG") and the Blooston Rural Carriers, and supported by The National Telecommunications Cooperative Association ("NTCA"). OBOD also joins requests that the Commission establish a separate comment cycle for challenging use of the American Roamer data as the exclusive basis for determining areas eligible for Phase I Mobility Fund support. If the Commission grants the extended and separate comment cycle on use of the American Roamer Data, OBOD looks forward to performing a thorough analysis of the proposed American Roamer Data, comparing it with its own data sources and identifying optimal approaches to determining eligibility for Phase I Mobility Fund support.

OBOD Participation:

OBOD has made a major commitment to the effective administration of broadband initiatives in Kentucky, and given the complexities of broadband availability, the provider "ecosystem" in this telecommunications market, and the geographic challenges and serious economic conditions in the eastern part of the state identified in the 2010 Decennial Census, OBOD believes it can be a valuable partner to the FCC and an effective steward of the Mobility Fund by providing unique and Kentucky-specific input.

Accordingly, OBOD requests that the Commission consider defining an advisory role for the OBOD (in partnership with FCC), in keeping with the *USF/ICC Transformation*

Order, and the Commission's commitments to fiscal responsibility and accountability, as an effective means to providing more targeted and efficient support for this program to the people of Kentucky.

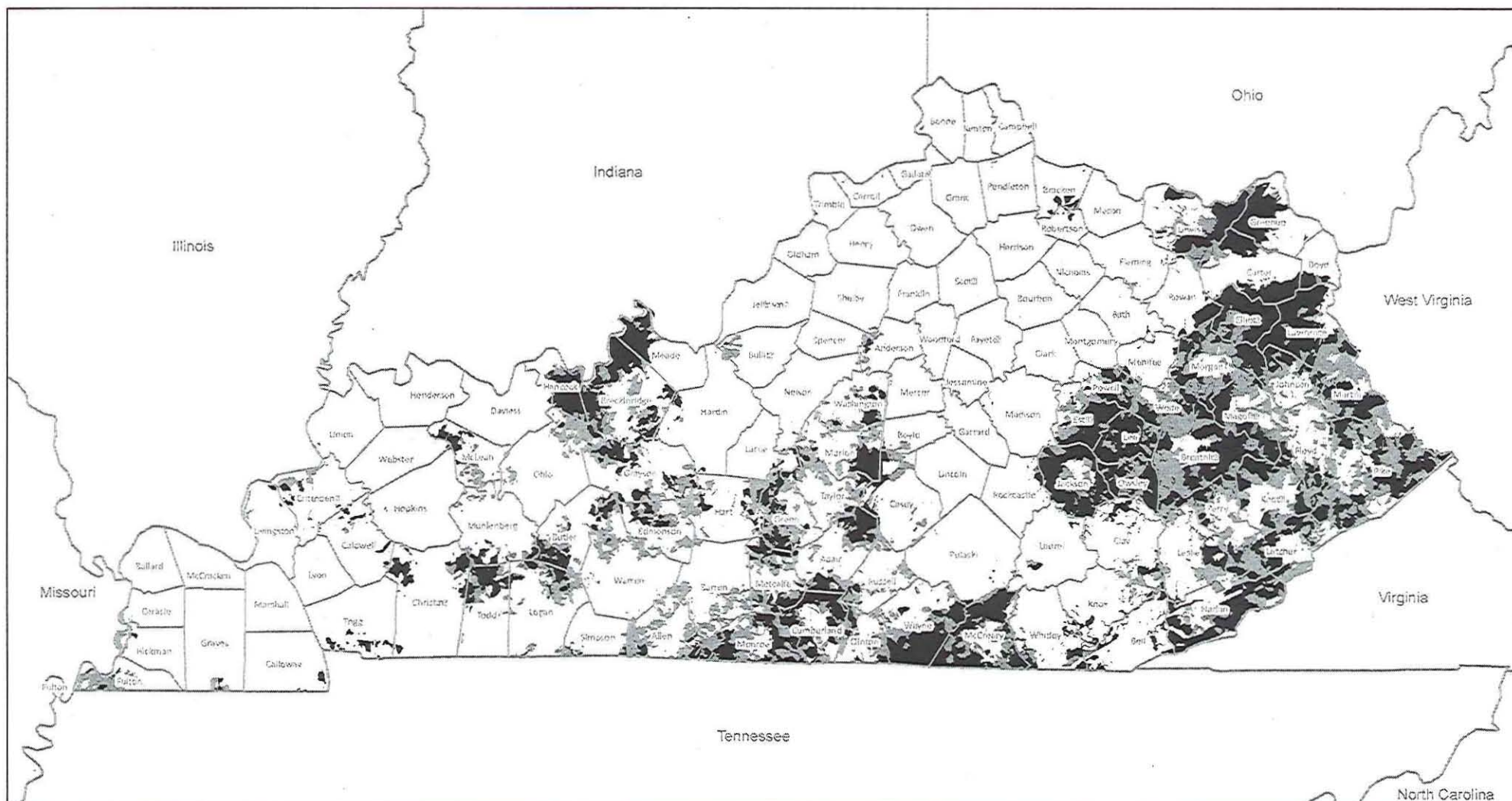
Respectfully submitted,



Melany K. Crawford
Deputy General Counsel

Enclosure

cc: Brian Kiser



Mobility Fund Phase 1 Potentially Eligible Areas

Analysis of American Roamer mobile wireless versus SBI mobile wireless.
 American Roamer data current as of January 1, 2012.
 SBI data current as of June 30, 2011.

Number of Census Blocks

Total Eligible Blocks: 23,996

14,253
 17,808
 20,411

Mobility Fund Eligible Areas

No Wireless Coverage
 No American Roamer Wireless Coverage
 No SBI Wireless Coverage

February 23, 2012